

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of RM-8658  
Section 68.4 of the Commission's Rules  
Hearing Aid Compatible Telephones

Request to Reopen the Petition for Rule Making

As a person with severe hearing loss who uses a hearing aid, access to the telephone is essential to my daily life. Congress recognized this when it passed the Hearing Aid Compatibility Act (HAC Act) of 1988. At that time Congress stated that "to the fullest extent made possible by technology and medical science, hard of hearing persons should have equal access to the national telecommunications network."

Virtually all telephones were required to be hearing aid compatible under the HAC Act, including new telephones and telephones associated with a new technology or service. Telephones used with public mobile services and private radio services were granted a provisional exemption from hearing aid compatibility. Such phones were in relatively limited use in 1988. This is no longer the case. Wireless phones have become ubiquitous and, in my opinion, will eventually displace wireline telephones as the dominant technology.

Congress directed the FCC to review the exemptions periodically. In response to this directive, the FCC announced that it would review these exemptions at least every five years. Twelve years have passed, and this review has NOT happened?

Five years ago, then-FCC Chairman Reed Hundt directed the wireless and hearing aid industries, professional and consumer groups to develop a solution to make wireless phones accessible to people with hearing loss. A "Summit" meeting was held in Washington, D.C. in January 1996 to address the problem. As a concerned consumer, I participated in the "Summit". It rapidly became apparent that solution of the problem would involve action by both the wireless and the hearing aid industries. At the conclusion of the "Summit" I was hopeful that a satisfactory accommodation would be achieved.

I am extremely disappointed that, after the passage of five years, little or no progress has been made. A few wireless telephone manufacturers offer add-on devices of questionable value costing more than the phone itself. Hearing aid manufacturers appear to be far more interested in cosmetic appeal of their products than in usability with wireless telephones. Although a standard for measurement of hearing aid susceptibility to interference of digital wireless telephones was developed, it has not yet been adopted and has had no discernible impact on hearing aid manufacturers.

At age 74, I am not prepared to wait yet another five years for access to personal telecommunications. If wireless telephone manufacturers continue to be exempt from hearing aid compatibility requirements under the HAC Act, full and equal access to PCS devices will never be achieved. Manufacturers will not voluntarily make

their products compatible. Telecommunication access for people with hearing loss will come about only through legislation or regulatory action. For this reason I strongly support the reopening of the petition for rulemaking to revoke the exemption of wireless telephones from provisions of the HAC Act.

Respectfully submitted,

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